

Daniel R. Guadalupe, Esq.

Partner

dguadalupe@pashmanstein.com

Direct: 201.373.2062

Cell: 609.658.0496



September 29, 2022

VIA ELECTRONIC CASE FILING

The Honorable Michael A. Hammer
United States Magistrate Judge
United States District Court for the District of New Jersey
Martin Luther King Federal Building and U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Civil Actions Nos., 19-7532, 20-18531, 21-6668,
21-10187, 21-11686, 21-20451, 22-4561 (ES) (MAH)*
Re: Defendants Celgene Corporation and Bristol-Myers Squibb

Dear Judge Hammer:

On September 15, 2022, the parties jointly requested that the Court extend the deadline for the parties' submission regarding use of a special discovery master in the above matters from September 16, 2022 to September 30, 2022; the Court granted that request on September 19, 2022. The parties have continued to confer on this subject, including on the names of potential candidates to propose, in an effort to determine a mutually agreeable such person. The parties believe that more time to confer on the issue will increase the likelihood that the parties reach a consensus on a candidate to submit to the Court, and therefore have agreed to request the Court to grant an extension of the September 30th deadline to October 19, 2022.

We respectfully request the grant of such an extension by way of "SO ORDERED" entry of this letter if the Court agrees to order so. Thank you.

Respectfully,

PASHMAN STEIN WALDER HAYDEN, PC
*Attorneys for Defendants Celgene Corporation and
Bristol-Myers Squibb*

A handwritten signature in black ink, appearing to read "Daniel R. Guadalupe".

Daniel R. Guadalupe

cc: All counsel of record (ECF)

SO ORDERED,

s/ Michael A. Hammer
HON. MICHAEL A. HAMMER, U.S.M.J.
DATED: 9/30/22

Court Plaza South
21 Main Street, Suite 200
Hackensack, NJ 07601

Phone: 201.488.8200
Fax: 201.488.5556
www.pashmanstein.com